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July 30, 2018

Via ECF

Hon. J. Paul Oetken, United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Courtroom 706
New York, New York 10007

RE: CMG Holdings Inc. v. Joseph Wagner, *et al.*
Civil Action No. 15-cv-05814-JPO

Dear Judge Oetken:

Our firm represents the Plaintiff and Third-Party Defendants in the above referenced action, and we hereby request, pursuant to paragraph 3(C) of your Honor's Individual Practices in Civil Cases, an adjournment of the Case Management Conference presently set for August 13, 2018 at 10:30 a.m. to either August 6, 8 (at or after 1 p.m.) or 9, 2018. Defendants consent to this request.

On May 31, 2018, the parties attended a settlement conference with Magistrate Judge Aaron. Thereafter, at the parties' request, the litigation was stayed through July 30, 2018, to permit continued settlement discussions supervised by Magistrate Judge Aaron. The parties have not reached a settlement. However, in anticipation of resuming and completing the litigation of this matter, counsel are conferring to jointly craft a deposition schedule for the case and a proposed revised scheduling order. The parties intend to file a letter motion along with the jointly proposed scheduling order shortly.

Plaintiff respectfully requests, pursuant to paragraph 3(C) of Your Honor's Individual Practices in Civil Cases, that the status conference be adjourned from August 13, 2018 to either August 6, 8 (at or after 1 p.m.) or 9, 2018. Plaintiff requests this adjournment to accommodate Plaintiff's counsel. Plaintiff's counsel Brad Edwards will be subject to post-surgery restrictions that will prevent him from attending the conference on August 13 and undersigned counsel has plans to be traveling out of the country.

Plaintiff has not previously requested an adjournment of this Case Management Conference. Defendants' counsel has consented to the requested adjournment.

Very truly yours,

Seth Lehrman

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